

January 22, 2015

Ralph I. Lancaster
Special Master
Pierce Atwood LLP
Merrill's Wharf
254 Commercial Street
Portland, ME 04101

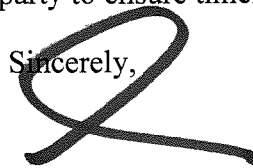
Re: Florida v. Georgia, Original No. 142
Supreme Court of the United States

Dear Special Master Lancaster:

The parties jointly submit this letter in connection with Section 6.1.2 of the Case Management Plan, which requires the parties to "notify the Special Master within ten (10) days of service of the requests," if "either party anticipates that full production will unavoidably require more than one hundred twenty (120) days from service."

At present, the parties cannot point to any particular category or class of documents that will "unavoidably" take more than 120 days to produce. The parties did think it prudent, however, to advise the Special Master that each party has requested a broad range of documents from the other side, and each party has begun the collection and assimilation of a large amount of data and documentation. The parties have been working together cooperatively, even before the January 12, 2015, date for beginning written discovery, to identify relevant documents and streamline the discovery process. That said, the parties anticipate that the data and document productions in this case will be substantial and time-consuming to complete, and it is possible that, as the parties learn more about the magnitude of the effort required, more than 120 days may be required for full production. As part of the monthly status reports, the parties will provide the Special Master with diligent and timely updates to their production estimates, as well as descriptions of the steps being taken by each party to ensure timely and complete production.

Sincerely,



Christopher M. Kise

cc: Craig S. Primis
Allen Winsor